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*Attorneys for Defendant,*  
**ALLIANT CREDIT UNION**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ELOISE PATTON, individually and on behalf  
of DONALD & ELOISE PATTON TRUST,

Plaintiff,

v.

ALLIANT CREDIT UNION, a foreign  
corporation.

Defendant.

CASE NO.: 2:24-cv-02345-JCM-DJA

**STIPULATION TO EXTEND DISCOVERY DEADLINES (First Request)**

Defendant Alliant Credit Union (“Alliant”), by and through its counsel of record, together with Eloise Patton (“Patton” and together with Alliant as the “Parties”), by and through her counsel of record, hereby submit this stipulation (the “Stipulation”) to extend discovery deadlines set forth in the Scheduling Order [ECF No. 10] (the “Scheduling Order”). The current cutoff date for discovery is July 16, 2025, which is more than twenty-one (21) days from the date of the filing of the first version of this Stipulation. This Stipulation is submitted in compliance with LR IA 6-1 and LR 26-3. This is the first request to extend discovery deadlines.

**(a) Statement Specifying the Discovery Completed.**

The Parties have each made initial disclosures and have supplemented the same on multiple occasions.

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On March 3, 2025, Patton served requests for admission, interrogatories, and requests for production on Alliant. On April 8, 2025, Alliant responded to the written discovery propounded by Patton.

Also on April 8, 2025, Alliant served requests for admission, interrogatories, and requests for production on Patton. On May 16, 2025, Patton responded to the written discovery propounded by Alliant.

**(b) Specific Description of the Discovery that Remains to be Completed.**

Alliant intends on taking the deposition of Patton.

Patton intends on taking the deposition(s) of Alliant's FRCP 30(b)(6) witness(es) and fact witnesses.

Patton intends to serve subpoenas on third parties and may serve additional written requests.

**(c) The Reasons Why the Remaining Discovery was Not Completed.**

The Parties believe that this matter will benefit from an early settlement conference and are submitting a stipulation requesting the same concurrently herewith. The Parties believe that this matter is more likely to be resolved before the Parties incur fees and costs related to depositions. Therefore, the remaining discovery has not been completed because the Parties want to attend a settlement conference before completing the remaining discovery.

**(d) Proposed Schedule for Completing All Remaining Discovery.**

	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Discovery Cut-Off Date:	July 16, 2025	October 14, 2025
L/D for Dispositive Motions:	August 15, 2025	November 13, 2025

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1 This is the first stipulation to extend discovery deadlines.

2 Dated: June 12, 2025

3 /s/ Kevin L. Hernandez

4 KEVIN L. HERNANDEZ, ESQ.

5 Nevada State Bar No. 12594

6 Law Office of Kevin L. Hernandez

7 8920 W. Tropicana Ave., Suite 101

8 Las Vegas, Nevada 89147

9 *Attorney for Plaintiff*

10 *ELOISE PATTON, individually and*

11 *on behalf of the DONALD &*

12 *ELOISE PATTON TRUST*

13 /s/ Larson A. Welsh

14 LARSON A. WELSH, ESQ.

15 Nevada State Bar No. 12517

16 Law Office of Hayes & Welsh

17 199 No. Arroyo Grande Blvd., Suite 200

18 Henderson, Nevada 89074

19 *Attorney for Defendant*

20 *ALLIANT CREDIT UNION*

21 IT IS SO ORDERED.

22 DATED: 6/13/2025

23 

24 U.S. MAGISTRATE JUDGE

25 Case No.: 2:24-cv-02345-JCM-DJA

26 Stipulation to Extend Discovery Deadlines (1st Request)

**Subject:** RE: Alliant Credit Union adv. Patton, etc. -- Stip & Order to Extend Discovery Deadlines  
**Date:** Thursday, June 12, 2025 at 1:17:01 PM Pacific Daylight Time  
**From:** Kevin Hernandez <Kevin@kevinhernandezlaw.com>  
**To:** Kathleen Bratton <k.bratton@hayesandwelsh.onmicrosoft.com>  
**CC:** Larson Welsh <lwelsh@lvlaw.com>  
**Attachments:** image002.jpg, image004.gif, image005.gif

Approved for filing. Thanks.

Kevin L. Hernandez, Esq.  
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**From:** Kathleen Bratton <[k.bratton@hayesandwelsh.onmicrosoft.com](mailto:k.bratton@hayesandwelsh.onmicrosoft.com)>  
**Sent:** Thursday, June 12, 2025 1:11 PM  
**To:** Kevin Hernandez <[Kevin@kevinhernandezlaw.com](mailto:Kevin@kevinhernandezlaw.com)>  
**Cc:** Larson Welsh <[lwelsh@lvlaw.com](mailto:lwelsh@lvlaw.com)>  
**Subject:** Re: Alliant Credit Union adv. Patton, etc. -- Stip & Order to Extend Discovery Deadlines

**CAUTION:** This email originated from outside of the organization. Be cautious when opening attachments or clicking links.

Per your request, please see the attached revised draft of the Stipulation to Extend Discovery deadlines. Please let me know if it is okay to use your e-signature to submit to the Court for filing/submission. Thank you.

Sincerely,  
**Kathleen Bratton**  
Legal Assistant  
**LAW OFFICE OF HAYES & WELSH**  
199 North Arroyo Grande Blvd., Suite 200